

ORIGINAL

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

2021 JUL 12 PM 4:30

DEPUTY CLERK \_\_\_\_\_ mb

Terrell Rayshawn Hughes  
Plaintiff

Civil Action No. \_\_\_\_\_

v.

**3-21CV1611-0**

CITY OF DENISON et al  
Defendant

Address: 300 West Main Street P.O Box 347 Denison Texas 75021

COMPLAINT:

I Terrell Hughes request removal of Cause Number: T1025152 to federal court and give this court jurisdiction over this matter due to Civil Rights violations of 1983 in the municipal Court of Denison

Dart Cherokee Basin Operating Co. v. Owens, 574 U.S.\_ (2015)., The removal Statue 28 U.S.C. §1446 requires only a "short and plain statement of the ground for removal.,

Short Plain statement

The City of Denison Municipal court (Donald M. Banman) and its Prosecution (Britton Brooks) has violated my god given constitutional rights and has maliciously intended to prosecute me after multiple errors on their part. They have failed to respond to motions and affidavits and violated my 6<sup>th</sup> amendment right. Every document that I have sent for the past 6 to 7 years have been disregarded by prejudice without examining the facts. On July 2, 2021, I was summoned to court under direct duress and coercion to Denison Municipal court called to check in via video chat and in person and no one was there except the clerk. I told her to have someone to Certify my right to subrogation as she told me she did not know what Subrogation is and told me she could only set another court date. I stated that I do not consent wrote on the document that was sent and left about a week later I receive a Threatening and disturbing summon to appear Aug 11, 2021. I have challenged the jurisdiction of Denison court, and they have failed to respond and certify my right to subrogation and is attempting to continue after jurisdiction has been challenged. Which deprives me of my constitutional rights. 18 U.S. Code § 242 Deprivation of rights under Color of law. In this said cause number there was no consent given at any time to the Denison police department which violates my fourth amendment as well. I Terrell Hughes am the only injured party. The date of this offense is Feb. 25, 2014 and was not settled then due to judicial errors and has been preventing me from my right to Travel. I have researched extensively the organic laws of the united states of America, including more than two hundred years of American case law (i.e., common law), and now I affirm that I have secured the UNALIENABLE and FUNDAMENTAL, UNRESTRICTED and UNREGULATED RIGHT TO TRAVEL upon both the public walkways and the highways, and transport my personal and allodial property, duly conveyed, unhindered by ANY

private, corporate or statutory law, or Department of Motor Vehicles (DMV) regulation or so called requirement. This unalienable right to travel is guaranteed by the 9<sup>th</sup> and 10<sup>th</sup> Amendments of the organic Constitution of the United States of America (1789) and Bill of Rights (1791) and upheld by many court decisions in the support of that right. I now explicitly RESERVE to ASSERT and DEFEND that right.

I believe this court has the power to decide this case and has jurisdiction over this lawsuit since my rights were violated in so many ways. I wish to be compensated for the damages assessed in the counterclaim- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence, Original Copies of all videos. Fingerprint removed from the system in Denison. And paid in U.S Dollars

#### COUNTERCLAIM

THE FOLLOWING DAMAGES HAVE BEEN ASSESSED AGAINST YOU SHOULD YOU FAIL TO MEET THE REQUIREMENTS BY LAW OR FAIL TO RESPOND, FAILURE TO RESPOND IS AN ADMISSION OF GUILT,

1. Failure to state a claim upon which relief can be granted- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
2. Failure to respond- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
3. Default by non-response or incomplete response- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
4. Constitutional Violations- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
5. Abuse of Authority- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
6. Denial of Due process- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
7. Unlawful Arrest- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
8. Trespassing- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
9. Conspiracy to Defraud- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
10. False imprisonment- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
11. Civil rights Violation 1983- 1,000,000. (One Million US Dollars) per

- third party Defendant, per count, per violation, per occurrence
12. Abuse of power- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
  13. Abuse of Process- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
  14. Coercion- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
  15. Malicious intent to prosecute- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
  16. Deprivation of rights 18 U.S.C§ 242- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
  17. cruel and unusual treatment- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
  18. mental and emotional injuries- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
  19. Unwarranted search and seizure- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
  20. Racial Profiling- 1,000,000. (One Million US Dollars) per third party Defendant, per count, per violation, per occurrence
  21. Failure to pay Counterclaim in full within (30) Thirty Calendar Days of Default as contained herein. \$1,000,000.00 (One Million US Dollars), per day, and interest of 1.5 % per month compounded daily for the first (30) Thirty Days from the date of default. After (30) Thirty Days beginning on the (31st) Thirty first Day after Default, the penalties for Failure to pay will increase by \$5,000,000.00 (Five Million Us Dollars Per Day) for each calendar day that this counterclaim is not paid in full, including interest. After (90) calendar days of the date of Default, the penalties for Failure to Pay Counterclaim will increase by \$10,000,000.00 (Ten Million US Dollars) per calendar day, that the Counterclaim is not paid in full, plus interest as indicated herein. All Claims are stated in US Dollars which means that a US Dollar will be defined, for the purposes of this counterclaim as, a One Ounce

Silver coin of .999 fine silver, or the equivalent par value as established by law or the exchange rate as set by the US Mint, whichever is the higher amount, for a certified One Ounce Silver Coin (US Silver Dollar) at the time of the first day of default as outlined herein. If the claim is to be paid in Federal Reserve Notes or other certified funds, these funds will only be accepted at Par Value as indicated above. Punitive damages will be assessed as seven (7) times the original number of damages. Punitive damages will be added to the original number of damages.

Date 7/12/2021

Signature Terrell Hughes

Print Name Terrell RayShawn Hughes

Address 9506 Ferguson Rd # 1089

City, State, Zip Dallas TX 75228

Telephone 214-791-6838



CITY OF DENISON

Municipal Court  
300 West Main Street  
P.O. Box 347  
Denison, TX 75021

903.465.2720 | Phone

www.cityofdenison.com



NOTICE OF COURT HEARING BY TELEPHONE CONFERENCE

DOCKET/CITATION NO: 1400009977 / T1025152  
VIOLATION: POSSESSION OF DRUG PARAPHERNALIA(MINOR)  
DATE OF OFFENSE: February 25, 2014  
TODAY'S DATE: July 2, 2021

STATE OF TEXAS  
vs.  
HUGHES, TERRELL RAYSHAWN

On March 13, 2020, the Supreme Court of Texas and Court of Criminal Appeals issued the First Emergency Order Regarding the COVID-19 State of Disaster and authorized all courts in Texas in any case – civil or criminal – without a participant's consent to conduct any hearing or court proceeding remotely through teleconferencing, video conferencing, or other means. In light of the COVID-19 pandemic and the recommendation that gatherings of more than 10 people shall be avoided, this Court will conduct your hearing by teleconference in order to advance the public health goal of limiting face-to-face meetings (also called "social distancing") to slow the spread of the coronavirus. The call-in information to participate in your hearing scheduled for August 11, at 09:30 AM, is as follows:

Call in Number: 1-346-248-7799 OR

Web link(s): Judge <https://txcourts.zoom.us/j/XXXXXXXXXX>  
Prosecutor <https://us02web.zoom.us/j/89543752275>

Meeting ID: 895 4375 2275

You will need to have an electronic device such as cell phone, tablet, laptop, or a computer to connect with the Judge or Prosecutor during your hearing. If you are unable to connect please call the Court office 903-464-4448.

Once you connect to the meeting, you will be put into a "waiting room" for online hearings. All defendants will wait here until their case is called, at which time you will be automatically pulled into the virtual courtroom. **When you are pulled into the hearing with the Judge or the Prosecutor be sure to unmute your phone by using \*6.** You do not need to do anything else – do not exit this room. Wait time could be up to an hour.

If you have any questions regarding this notice, please feel free to contact the Municipal Court (903) 464-4448.

Fine Amount: \$ 567.50

SENT BY MAIL TO DEFENDANT ON July 2, 2021.

TERRELL RAYSHAWN HUGHES  
9510 Ferguson Rd.  
DALLAS, TX 75228

*Moving Forward. Kicking Back.*

Donald M. Banman  
Presiding Judge

Brett L. Evans  
Alternate Judge

Britton Brooks  
Prosecutor

J. Eric Newton  
City Marshal

## CIVIL COVER SHEET

Case 3:21-cv-01611-G-BH Document 3 Filed 07/12/21 Page 6 of 6 PageID 10

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS Terrell Ray Shawn Hughes

DEFENDANTS

the City of Donison(b) County of Residence of First Listed Plaintiff Dallas  
(EXCEPT IN U.S. PLAINTIFF CASES)County of Residence of First Listed Defendant Grayson  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                        |   | PTF                        | DEF                                   |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5            |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input checked="" type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input checked="" type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Civil Rights of 1983

Brief description of cause: Deprivation of Rights

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

21,000,000

CHECK YES only if demanded in complaint:

JURY DEMAND:

☐ Yes ☒ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

## FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_